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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

TIANMING WANG, DONG HAN,)	CASE NO. CV-18-000030
YONGJUN MENG, LIANGCAI SUN,)	
YOU LI WANG, QINGCHUN XU, and)	GOLD MANTIS CONSTRUCTION
DUXIN YANG)	DECORATION (CNMI) LLC'S ANSWER
)	TO PLAINTIFFS' FIRST AMENDED
Plaintiffs,)	COMPLAINT
)	
v.)	
)	
GOLD MANTIS CONSTRUCTION)	
DECORATION (CNMI), LLC, MCC)	
INTERNATIONAL SAIPAN LTD. CO., and)	
IMPERIAL PACIFIC INTERNATIONAL)	
(CNMI), LLC,)	
Defendants.)	

COMES NOW, the undersigned counsel Tiberius D. Mocanu, on behalf of the Defendant Gold Mantis Construction Decoration (CNMI), LLC ("Gold Mantis"), and hereby Answer's Plaintiffs' First Amended Complaint as follows:

Introduction

Paragraphs 1-8 are written in narrative form and are conclusory. To the extent they make factual allegations not contained in the body of the First Amended Complaint, Gold Mantis denies the allegations.

Jurisdiction & Venue

9. Admitted

10. Admitted

11. Admitted

Parties

12. Admitted

13. Admitted

14. Admitted

15. Admitted

16. Admitted

17. Admitted

18. Admitted

19. Admitted

20. Admitted

21. Admitted

22. Admitted

23. Admitted

1 24. Denied

2 25. Admitted

3 26. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 27. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 28. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 29. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 30. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 31. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15 32. No answer is necessary

16 **Facts**

17 33. Admitted

18 34. Admitted

19 35. Admitted

20 36. Admitted

1 37. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 38. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 39. Denied

7 40. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.
9

10 41. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 42. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.
14

15 43. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.

17 44. Gold Mantis is without sufficient information to admit or deny the allegations
18 contained in this paragraph and thus denies the same.
19

20 45. Denied

21 46. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.
23

24 47. Gold Mantis is without sufficient information to admit or deny the allegations
25 contained in this paragraph and thus denies the same.
26
27
28

1 48. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 49. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 50. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 51. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 52. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 53. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 54. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15 55. Denied

16 56. Denied

17 57. Denied

18 58. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 59. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.

1 60. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 61. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 62. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 63. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 64. Denied

10 65. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 66. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.

14 67. Gold Mantis is without sufficient information to admit or deny the allegations
15 contained in this paragraph and thus denies the same.

16 68. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.

18 69. Denied

19 70. Gold Mantis is without sufficient information to admit or deny the allegations
20 contained in this paragraph and thus denies the same.

1 71. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 72. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 73. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 74. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 75. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 76. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 77. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15 78. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.

17 79. Gold Mantis is without sufficient information to admit or deny the allegations
18 contained in this paragraph and thus denies the same.

19 80. Gold Mantis denies that "Supervisor Kong" was its manager or an employee of
20 Gold Mantis. Gold Mantis is without sufficient information to admit or deny the
21 remaining allegations contained in this paragraph and thus denies the same.
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1 81. Denied

2 82. Denied

3 83. Denied

4 84. Admitted

5
6 85. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 86. Denied to the extent that it was Gold Mantis that was assigning overtime work.

9
10 87. Denied

11 88. Admitted that Gold Mantis provided food for some of the workers on the job
12 site. Denied as to the remaining allegations.

13 89. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15
16 90. Denied

17 91. Denied

18 92. Denied

19
20 93. Admitted that Gold Mantis employed a safety officer and that that person's
21 duty was to maintain a safe workplace. The remainder of the allegations are
22 denied.

23
24 94. Admitted that Gold Mantis was delinquent in paying its workers the minimum
25 wage required under applicable laws. Gold Mantis is without sufficient
26

1 information to admit or deny the remaining allegations contained in this
2 paragraph and thus denies the same.

3 95. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5
6 96. Denied

7 97. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9
10 98. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 99. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.

14
15 100. Denied

16 101. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph as they relate to Supervisor Kong and thus denies
18 the same. Gold Mantis further denies the remainder of the allegations in the
19 paragraph.

20
21 102. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.

23
24 103. Gold Mantis is without sufficient information to admit or deny the allegations
25 contained in this paragraph and thus denies the same.

1 104. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 105. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 106. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 107. Gold Mantis is without sufficient information to admit or deny the allegations
9 contained in this paragraph and thus denies the same.
10

11 108. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 109. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.
15

16 110. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.
18

19 111. Gold Mantis is without sufficient information to admit or deny the allegations
20 contained in this paragraph and thus denies the same.

21 112. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.
23

24 113. Gold Mantis is without sufficient information to admit or deny whether
25 Supervisor Kong physically assaulted "a Gold Mantis" employee and thus denies
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27
28

1 the allegations. Gold Mantis denies the allegation which implies that Supervisor
2 Kong was a Gold Mantis employee and thus could be “terminated.”

3 114. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 115. Denied

7 116. Denied

8 117. Denied

9 118. Denied
10

11 119. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.
13

14 120. Denied

15 121. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.
17

18 122. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 123. It is admitted that Gold Mantis management returned to China in and around
21 March of 2017, however any correlation to the remaining allegations in the
22 paragraph is denied as well as the other allegations contained therein.
23

24 124. Denied
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1 125. It is admitted that Gold Mantis settled certain labor disputes with the U.S.

2 Department of Labor. The remaining allegations or correlation to the same are
3 denied.

4 126. Admitted

5 127. Denied

6 128. Admitted

7 129. Admitted

8 130. Admitted to the extent that Gold Mantis had an obligation to comply with

9 OSHA regulations and other applicable laws as it relate to their employees.

10 Denied as to the remainder of the allegations.

11 131. Denied

12 132. Gold Mantis is without sufficient information to admit or deny the allegations

13 contained in this paragraph and thus denies the same.

14 133. Denied

15 134. Gold Mantis is without sufficient information to admit or deny the allegations

16 contained in this paragraph and thus denies the same.

17 135. Gold Mantis is without sufficient information to admit or deny the allegations

18 contained in this paragraph and thus denies the same.

19 136. Gold Mantis is without sufficient information to admit or deny the allegations

20 contained in this paragraph and thus denies the same.

1 137. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 138. Denied to the extent that the paragraph is in reference to Gold Mantis

4 139. Gold Mantis is without sufficient information to admit or deny the allegations
5 contained in this paragraph and thus denies the same.
6

7 140. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.
9

10 141. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 142. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.
14

15 143. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.

17 144. Admitted

18 145. Denied

19 146. Admitted to the extent that OSHA found violations committed by Gold Mantis.
20
21 Gold Mantis is without information to admit or deny the remaining allegations
22 and thus denies the same.
23

24 147. Admitted

25 148. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
28

1 149. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 150. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 151. Denied

7 152. Admitted to the extent that a fire occurred in or around the date alleged. Gold
8 Mantis is without sufficient information to admit or deny the remaining
9 allegations and thus denies the same.
10

11 153. Admitted that a worker died on or about the date alleged. Gold Mantis is
12 without sufficient information to admit or deny the remaining allegations and
13 thus denies the same.
14

15 154. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.
17

18 155. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 156. Denied to the extent the allegation is directed toward Gold Mantis. To the
21 extent that the allegation is directed to the other Defendants, Gold Mantis is
22 without sufficient information to admit or deny the allegation and thus denies
23 the same.
24

25 157. Denied to the extent the allegation is directed toward Gold Mantis. To the
26 extent that the allegation is directed to the other Defendants, Gold Mantis is
27
28

1 without sufficient information to admit or deny the allegation and thus denies
2 the same.

3 158. Denied to the extent the allegation is directed toward Gold Mantis. To the
4 extent that the allegation is directed to the other Defendants, Gold Mantis is
5 without sufficient information to admit or deny the allegation and thus denies
6 the same.

7
8 159. Denied to the extent the allegation is directed toward Gold Mantis. To the
9 extent that the allegation is directed to the other Defendants, Gold Mantis is
10 without sufficient information to admit or deny the allegation and thus denies
11 the same.

12
13 160. Denied to the extent the allegation is directed toward Gold Mantis. To the
14 extent that the allegation is directed to the other Defendants, Gold Mantis is
15 without sufficient information to admit or deny the allegation and thus denies
16 the same.

17
18 161. Denied to the extent the allegation is directed toward Gold Mantis. To the
19 extent that the allegation is directed to the other Defendants, Gold Mantis is
20 without sufficient information to admit or deny the allegation and thus denies
21 the same.

22
23 162. Gold Mantis is without sufficient information to admit or deny the allegations
24 contained in this paragraph and thus denies the same.

25
26 163. Denied
27
28

1 164. Denied to the extent the allegation is directed toward Gold Mantis. To the
2 extent that the allegation is directed to the other Defendants, Gold Mantis is
3 without sufficient information to admit or deny the allegation and thus denies
4 the same.
5

6 165. Denied to the extent the allegation is directed toward Gold Mantis. To the
7 extent that the allegation is directed to the other Defendants, Gold Mantis is
8 without sufficient information to admit or deny the allegation and thus denies
9 the same.
10

11 166. Denied to the extent the allegation is directed toward Gold Mantis. To the
12 extent that the allegation is directed to the other Defendants, Gold Mantis is
13 without sufficient information to admit or deny the allegation and thus denies
14 the same.
15

16 167. Denied to the extent the allegation is directed toward Gold Mantis. To the
17 extent that the allegation is directed to the other Defendants, Gold Mantis is
18 without sufficient information to admit or deny the allegation and thus denies
19 the same.
20

21 168. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.
23

24 169. Gold Mantis is without sufficient information to admit or deny the allegations
25 contained in this paragraph and thus denies the same.
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1 170. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 171. Admitted

4 172. Admitted

5
6 173. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8
9 174. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 175. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13
14 176. Gold Mantis is without sufficient information to admit or deny the allegations
15 contained in this paragraph and thus denies the same.

16 177. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.

18
19 178. Denied

20 179. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.

22
23 180. Gold Mantis is without sufficient information to admit or deny the allegations
24 contained in this paragraph and thus denies the same.

25 181. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
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1 182. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 183. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 184. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 185. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 186. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 187. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 188. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15 189. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.

17 190. Gold Mantis is without sufficient information to admit or deny the allegations
18 contained in this paragraph and thus denies the same.

19 191. Gold Mantis is without sufficient information to admit or deny the allegations
20 contained in this paragraph and thus denies the same.

1 192. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 193. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 194. Admitted

7 195. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.
9

10 196. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 197. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.
14

15 198. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.

17 199. Gold Mantis is without sufficient information to admit or deny the allegations
18 contained in this paragraph and thus denies the same.
19

20 200. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.

22 201. Gold Mantis is without sufficient information to admit or deny the allegations
23 contained in this paragraph and thus denies the same.
24

25 202. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
28

1 203. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 204. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.

5 205. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 206. Gold Mantis admits that there was a protest in January of 2017 by workers
8 who alleged they were owed money by Gold Mantis.

9 207. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same.

11 208. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.

13 209. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.

15 210. Admitted

16 211. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.

18 212. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 213. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.

1 214. Denied

2 215. Gold Mantis is without sufficient information to admit or deny the allegations
3 contained in this paragraph and thus denies the same.

4 216. Gold Mantis is without sufficient information to admit or deny the allegations
5 contained in this paragraph and thus denies the same.

6 217. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 218. Denied

9 219. Gold Mantis is without sufficient information to admit or deny the allegations
10 contained in this paragraph and thus denies the same. Gold Mantis denies that
11 its manager instructed Plaintiff to perform the task alleged.

12 220. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.

14 221. Gold Mantis is without sufficient information to admit or deny the allegations
15 contained in this paragraph and thus denies the same.

16 222. Gold Mantis denies that Mr. Kong was either its employee or agent. Gold
17 Mantis admits that it did have personnel at the job site on the day that Plaintiff
18 was injured and that it was aware that he was injured.

19 223. Denied

20 224. Denied

21 225. Denied

1 226. Gold Mantis denies directing Plaintiff in any manner. As for the remainder of
2 the allegations contained in this paragraph, Gold Mantis is without sufficient
3 information to admit or deny and therefore denies the same.

4 227. Gold Mantis is without sufficient information to admit or deny the allegations
5 contained in this paragraph and thus denies the same.

6 228. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 229. Gold Mantis is without sufficient information to admit or deny the allegations
9 contained in this paragraph and thus denies the same.

10 230. Gold Mantis is without sufficient information to admit or deny the allegations
11 contained in this paragraph and thus denies the same.

12 231. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.

14 232. Denied to the extent that this paragraph alleges that Gold Mantis had a specific
15 duty of care to the Plaintiff and that it breached that duty.

16 233. Denied

17 234. Gold Mantis is without sufficient information to admit or deny the allegations
18 contained in this paragraph and thus denies the same.

19 235. Denied

20 236. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.

1 237. Gold Mantis admits that it had personnel at the work site when Mr. Han was
2 allegedly injured.

3 238. Denied

4 239. Gold Mantis is without sufficient information to admit or deny the allegations
5 contained in this paragraph and thus denies the same.
6

7 240. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.
9

10 241. Denied

11 242. Gold Mantis denies that Mr. Meng was “employed” by Gold Mantis. The
12 remaining allegations in this paragraph are admitted.
13

14 243. Denied.

15 244. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.
17

18 245. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 246. Gold Mantis is without sufficient information to admit or deny the allegations
21 contained in this paragraph and thus denies the same.
22

23 247. Gold Mantis is without sufficient information to admit or deny the allegations
24 contained in this paragraph and thus denies the same.

25 248. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
28

1 249. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 250. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 251. Denied

7 252. Denied

8 253. Gold Mantis is without sufficient information to admit or deny the allegations
9 contained in this paragraph and thus denies the same.
10

11 254. Gold Mantis is without sufficient information to admit or deny the allegations
12 contained in this paragraph and thus denies the same.
13

14 255. Denied

15 256. Gold Mantis is without sufficient information to admit or deny the allegations
16 contained in this paragraph and thus denies the same.
17

18 257. Gold Mantis denies that Mr. Sun was its employee.

19 258. Gold Mantis is without sufficient information to admit or deny the allegations
20 contained in this paragraph and thus denies the same.
21

22 259. Gold Mantis is without sufficient information to admit or deny the allegations
23 contained in this paragraph and thus denies the same.
24

25 260. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
28

1 261. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 262. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 263. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 264. Gold Mantis is without sufficient information to admit or deny the allegations
9 contained in this paragraph and thus denies the same.
10

11 265. Gold Mantis denies that Mr. Youli Wang was its employee. The remainder of
12 the allegation in this paragraph is admitted.

13 266. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.
15

16 267. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.
18

19 268. Denied

20 269. Denied

21 270. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.
23

24 271. Gold Mantis is without sufficient information to admit or deny the allegations
25 contained in this paragraph and thus denies the same.
26
27
28

1 272. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 273. Gold Mantis is without sufficient information to admit or deny the allegations
4 contained in this paragraph and thus denies the same.
5

6 274. Gold Mantis is without sufficient information to admit or deny the allegations
7 contained in this paragraph and thus denies the same.

8 275. Gold Mantis is without sufficient information to admit or deny the allegations
9 contained in this paragraph and thus denies the same.
10

11 276. Denied

12 277. Gold Mantis denies that Mr. Xu was its employee.

13 278. Gold Mantis is without sufficient information to admit or deny the allegations
14 contained in this paragraph and thus denies the same.
15

16 279. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.
18

19 280. Gold Mantis is without sufficient information to admit or deny the allegations
20 contained in this paragraph and thus denies the same.

21 281. Gold Mantis is without sufficient information to admit or deny the allegations
22 contained in this paragraph and thus denies the same.
23

24 282. Denied

25 283. Gold Mantis is without sufficient information to admit or deny the allegations
26 contained in this paragraph and thus denies the same.
27
28

1 284. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 285. Denied

4 286. Gold Mantis denies that Mr. Du was its employee.

5 287. Gold Mantis is without sufficient information to admit or deny the allegations
6 contained in this paragraph and thus denies the same.

7 288. Gold Mantis is without sufficient information to admit or deny the allegations
8 contained in this paragraph and thus denies the same.

9 289. Admitted

10 290. Denied

11 291. Denied

12 292. Gold Mantis is without sufficient information to admit or deny the allegations
13 contained in this paragraph and thus denies the same.

14 293. Gold Mantis is without sufficient information to admit or deny the allegations
15 contained in this paragraph and thus denies the same.

16 294. Gold Mantis is without sufficient information to admit or deny the allegations
17 contained in this paragraph and thus denies the same.

18 295. Gold Mantis is without sufficient information to admit or deny the allegations
19 contained in this paragraph and thus denies the same.

20 296. Denied

21 297. Denied

1 298. Denied

2 299. Denied

3 300. Denied

4 301. Denied

5 302. Denied

6 303. Admitted

7 304. Gold Mantis is without sufficient information to admit or deny the allegations
8
9 contained in this paragraph and thus denies the same.

10
11 305. Admitted

12 306. Admitted

13 307. Gold Mantis is without sufficient information to admit or deny the allegations
14
15 contained in this paragraph and thus denies the same.

16 308. The paragraph does not call for a response.

17 309. Denied

18 310. Denied

19 311. Denied

20 312. Denied

21 313. Denied

22 314. Denied

23 315. Gold Mantis is without sufficient information to admit or deny the allegations
24
25 contained in this paragraph and thus denies the same.

1 316. Gold Mantis is without sufficient information to admit or deny the allegations
2 contained in this paragraph and thus denies the same.

3 317. Denied

4 318. Denied

5 319. Denied

6 320. Denied

7 321. Denied

8 322. Denied

9 323. No response necessary

10 324. Denied

11 325. Denied

12 326. Denied

13 327. Denied

14 328. Denied

15 329. No response necessary

16 330. Denied

17 331. Denied

18 332. This paragraph as well as its associated subsections is denied

19 333. Denied

20 334. Denied

21 335. Denied

1 336. No response is necessary

2 337. Admitted that section 9304(c) deals with the payment of subcontractors. Any
3 legal conclusion implied from the recitation of this section is denied.

4 338. Gold Mantis admits that Plaintiffs were the employees of a subcontractor. It
5 does not have sufficient information to admit or deny whether the
6 subcontractor has paid the Plaintiffs and thus denies the same.

7
8 339. Admitted

9
10 340. Denied

11 **Affirmative Defenses**

- 12 1. Plaintiffs have failed to state a claim for which relief can be granted.
13 2. Statute of Limitations
14 3. Accord and Satisfaction
15 4. Assumption of the Risk
16 5. Contributory Negligence
17 6. Estoppel
18 7. Fraud
19 8. Illegality
20 9. Injury by Fellow Servant
21 10. Laches
22 11. License
23 12. Payment
24
25
26
27
28

13. Release

14. Waiver

Dated: July 8, 2019

/s/

TIBERIUS D. MOCANU

Attorney for Defendant Gold Mantis